

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

|                                   |   |                                     |
|-----------------------------------|---|-------------------------------------|
| CONSUMER FINANCIAL                | ) |                                     |
| PROTECTION BUREAU,                | ) |                                     |
|                                   | ) | Civil Action No.: 6:23-CV-04177-JDA |
| Plaintiff,                        | ) |                                     |
|                                   | ) |                                     |
| v.                                | ) |                                     |
|                                   | ) |                                     |
| HEIGHTS FINANCE HOLDING CO. f/k/a | ) |                                     |
| SOUTHERN MANAGEMENT               | ) |                                     |
| CORPORATION; COVINGTON CREDIT     | ) |                                     |
| OF ALABAMA, INC; SOUTHERN         | ) |                                     |
| FINANCE OF TENNESSEE, INC.;       | ) |                                     |
| COVINGTON CREDIT OF GEORGIA,      | ) |                                     |
| INC.; SOUTHERN FINANCE OF SOUTH   | ) |                                     |
| CAROLINA, INC.; COVINGTON         | ) |                                     |
| CREDIT OF TEXAS, INC.; COVINGTON  | ) |                                     |
| CREDIT, INC.; and QUICK CREDIT    | ) |                                     |
| CORPORATION                       | ) |                                     |
|                                   | ) |                                     |
| Defendants.                       |   |                                     |

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**DEFENDANTS' MOTION TO STAY DISCOVERY**

NOW COME Defendants Heights Finance Holding Co. f/k/a Southern Management Corporation, Covington Credit of Alabama, Inc., Southern Finance of Tennessee, Inc., Covington Credit of Georgia, Inc., Southern Finance of South Carolina, Inc., Covington Credit of Texas, Inc., Covington Credit, Inc., and Quick Credit Corporation (collectively, “Defendants”), by and through their counsel, hereby submit this Motion to Stay Discovery (this “Motion”) pending the Court’s ruling on Defendant’s Motion for Judgment on the Pleadings (the “Rule 12(c) Motion”) pursuant to Fed. R. Civ. P. 26(c). In support of this Motion, Defendants incorporate by reference the Memorandum in Support submitted contemporaneously herewith. For the reasons more fully described therein, this Court should grant this Motion and stay all discovery in this action pending the Court’s ruling on the Rule 12(c) Motion. Pursuant to Local Rule 7.02, the undersigned

conferred with Plaintiff's counsel regarding this Motion. Plaintiff intends to file a response in opposition to this Motion.

WHEREFORE, Defendants respectfully request that the Court enter an Order granting this Motion and staying all discovery pending a ruling by the Court on the Rule 12(c) Motion. Defendants further request any additional relief this Court deems just and proper.

Dated: July 30, 2024

Respectfully submitted,

/s/ William M. Wilson III

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